

COLIN L. PEARCE (SB# 137252)
 GREGORY G. ISKANDER (SB# 200215)
 MATTHEW K. KLISZEWSKI (SB# 218832)
 DUANE MORRIS LLP
 One Market Spear Tower, Suite 2000
 San Francisco, CA 94105-1104
 Telephone: (415) 371-2200
 Facsimile: (415) 371-2201
 Email: clpearce@duanemorris.com

Attorneys for Plaintiff/Counter-Defendant
 WINNIE PAPIR, A/S

FILED

DEC 07 2005

RICHARD W. WIEKING
 CLERK U.S. DISTRICT COURT,
 NORTHERN DISTRICT OF CALIFORNIA

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

WINNIE PAPIR, A/S, a Danish Corporation,

Plaintiff,

v.

DAVID MOSTNY, an individual, and
 DOES 1 through 10, inclusive,

Defendants.

Case No.: C 05-1194 WHA MJJ

**STIPULATION FOR CONTINUANCE OF
 CASE MANAGEMENT CONFERENCE;
 [PROPOSED] ORDER**

DAVID MOSTNY, individually and
 doing business as EUROWRAP, LTD.

Counter-claimant,

v.

WINNIE PAPIR, A/S and
 ROES 1 through 10, inclusive

Counter-defendants.

Date: January 17, 2006

Time: 2:00 p.m.

Ctrm: 11

Judge: Hon. Martin J. Jenkins

1 A Case Management Conference was previously scheduled in this action for December 6,
2 2005. On December 5, 2005, this Court notified counsel that it had unilaterally continued the Case
3 Management Conference to December 20, 2005.

4 Counsel for Plaintiff/Counter-Defendant Winnie Papir A/S ("Winnie Papir") is not available
5 to attend the continued Case Management Conference because of travel associated with the holiday
6 season. Counsel scheduled his trip well in advance of the Court's continuance of the December 6,
7 2005 Case Management Conference.

8 Based on the unavailability of counsel for Winnie Papir, counsel for Defendant/Counter-
9 Claimant David Mostny ("Mostny"), Ronald Foreman, has graciously agreed to stipulate to a
10 continuance of the Case Management Conference to a mutually convenient date. The parties
11 accordingly stipulate and request that the Court further continue the December 6, 2005 Case
12 Management Conference from December 20, 2005 to January 17, 2006.

13 The parties previously submitted Case Management Conference statements in advance of the
14 December 6, 2005 conference. This action is currently stayed pursuant to a June 20, 2005 Order of
15 this Court. In addition, this Court previously continued a September 29, 2005 Case Management
16 Conference to December 6, 2005. This additional brief continuance of the rescheduled December
17 20, 2005 conference to January 17, 2006 will therefore not prejudice any party to the action, nor will
18 it unreasonably interfere with the Court's calendar.

19 THEREFORE, the parties hereby AGREE, STIPULATE and REQUEST that the rescheduled
20 Case Management Conference be continued from December 20, 2005 to January 17, 2006.

21
22 Dated: December 6, 2005

DUANE MORRIS, LLP

23
24 By: 

25 Colin L. Pearce
26 Attorneys for Plaintiff/Counter-Defendant
27 WINNIE PAPIR, A/S
28

1 Dated: December 6, 2005

FOREMAN & BRASSO

By: 

Ronald D. Foreman


Attorneys for Defendant/Counter-Claimant
DAVID MOSTNY

7 ORDER

8 Upon the Stipulation of the Parties and in the interests of justice and for GOOD CAUSE
9 shown, IT IS HEREBY ORDERED that the rescheduled Case Management Conference is continued
10 from December 20, 2005 to January 17, 2006.

11
12 SO ORDERED.

13 Dated: December 7, 2005


THE HONORABLE MARTIN J. JENKINS
Judge of the United States District Court,
Northern District of California

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